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*Attorney for Defendants Retailer Web Services, LLC  
and Retailer Web Services II, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

THE HOMESOURCE, CORP.,

Plaintiff,

v.

RETAILER WEB SERVICES, LLC,  
et al.,

Defendants.

Civil Action No.: 1:18-cv-11970-ECR-  
AMD

Hon. Eduardo C. Robreno

Hon. Ann Marie Donio

MOTION DATE: JUNE 7, 2021

**DEFENDANTS' NOTICE OF MOTION  
FOR SANCTIONS**

**ORAL ARGUMENT REQUESTED**

**PLEASE TAKE NOTICE** that, on June 7, 2021, at 10:00 a.m. or as soon thereafter as counsel may be heard, Defendants Retailer Web Services, LLC and Retailer Web Services II, LLC (collectively “RWS”), shall move before the Honorable Eduardo C. Robreno, U.S.D.J. at the United States District Court for the District of New Jersey in Camden, New Jersey for an Order granting sanctions against Plaintiff The HomeSource Corp.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, RWS shall rely upon the accompanying Brief, the Court’s Discovery Order filed at ECF No. 129, the Court’s Discovery Order filed at ECF No. 264, the May 12, 2021 Declaration of Dominique J. Carroll, Esq. (and the exhibits thereto), the May 6, 2021 Declaration of Michal Malkiewicz and the May 6, 2021 Declaration of Jennifer L. Bayuk, Ph.D..

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that the moving parties request oral argument.

Dated: May 12, 2021

Respectfully Submitted,

**FOX ROTHSCHILD LLP**

/s/ Dominique J. Carroll

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